

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,  
Debtor.

Case No. 23-13237-pmm

Chapter 11

**Debtor's Motion to Withdraw Funds from Court Registry**

**AND NOW**, Debtor Tri-State Paper, Inc., by and through its attorney, states as follows:

1. The Court previously ordered the Debtor to deposit insurance proceeds of \$679,353.08 into the court registry because the Debtor's entitlement to the funds was disputed between the Debtor, Citizens Bank, and Young Adjustment Company. ECF No. 132, 143.

2. Citizens Bank and the Debtor recently filed a motion requesting that the Clerk pay Citizens Bank in the amount of \$434,032.48 from the registry funds. ECF No. 153.

3. Young Adjustment Company recently filed an application for compensation in the amount of \$33,967.65. ECF No. 159.

4. Because the dispute over ownership of the funds has been resolved, the Court must enter an order directing the Clerk to pay Young Adjustment's fee application from the registry funds, and then pay the balance of funds in the registry to the Debtor.

**NOW, THEREFORE**, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in its favor as may be necessary and proper under the law.

Date: February 12, 2024

CIBIK LAW, P.C.  
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